



November 17, 2021

***Via Email/Sharefile***

Mr. Sam Abdellatif  
Land and Redevelopment Programs Branch  
US Environmental Protection Agency Region 2  
290 Broadway, 25<sup>th</sup> Floor  
New York, New York 10007-1866

**Re: 9/20/2021 Response to Second and Third Quarter 2020 Progress Report RTC  
Hess Corporation Former Port Reading Complex (HC-PR)  
750 Cliff Road  
Woodbridge, Middlesex County, New Jersey  
NJDEP PI# 006148  
ISRA Case No. E20130449  
EPA ID No. NJD045445483**

Dear Mr. Abdellatif:

Earth Systems, Inc. (Earth Systems) has prepared this letter on behalf of Hess Corporation (Hess) regarding the September 20, 2021 response letter provided by the New Jersey Department of Environmental Protection (NJDEP) and Environmental Protection Agency (EPA) relating to the above referenced November 13, 2020 Response to Comment (RTC) letter.

**NJDEP Comments & Earth Systems/Hess Responses**

**NJDEP Comment 1:** To clarify:

- A. The quarterly landfarm ground water sampling data only needs to be included in the semi-annual ground water monitoring reports. This data does not need to also be included in the HSWA quarterly progress reports.
- B. Site wide gauging is now performed twice a year – May and November. The site- wide gauging and contour maps should be provided with the 2<sup>nd</sup>

Quarter (May data and contour maps) and 4<sup>th</sup> Quarter (November data and contour maps) Progress Reports.

- C. Annual site sampling is performed in November. The annual ground water sampling data should be provided with the 4<sup>th</sup> Quarter Progress Report.

**Earth Systems/Hess Response 1:** The clarification is noted. Also, as directed by the NJDEP, the quarterly landfarm groundwater sampling data was only included in the July 2021 Semi-Annual Report and not in any of the 2021 quarterly progress reports. In addition, the sitewide gauging and contour maps were provided in the 2021 2<sup>nd</sup> Quarter Report and the November sitewide gauging and sampling documentation will be included in the 2021 4<sup>th</sup> Quarter Report.

**NJDEP Comment 9:** Further discussion is needed on the landfarms. The following information should be included in a response: clarification of the timelines for landfarm closures and discussion of temporary capping or provisions to remove standing water pending completion of closure at the North and South Landfarms (that do not have leachate collection systems).

**Earth Systems/Hess Response 9:** The following information is included in the quarterly reports regarding the current status and future schedule of the landfarms:

- AOC 1 – North Landfarm (SWMU)
  - Routine groundwater monitoring will continue at the North Landfarm, pending approval and execution of the proposed Closure Plan. A Remedial Action Workplan (RAW) was submitted to the USEPA and NJDEP for the North Landfarm in September 2016. Comments were received from the USEPA and NJDEP on June 7, 2018. A 90% Soil Remediation Action Design (RAD) for the North Landfarm engineering control was submitted to the USEPA and NJDEP on October 24, 2019. The NJDEP and USEPA issued an approval letter for the 90% design on April 28, 2020. The current owner, Buckeye, has completed the lining of the tankfield located directly adjacent to the North Landfarm. The 100% RAD will be finalized once the as-built drawings are provided to Hess/Earth Systems. Once the 100% RAD is reviewed and approved by the NJDEP and EPA, permit applications will be submitted to the applicable agencies for review.
  - The updated Groundwater Sampling Plan for the North Landfarm is being prepared with a targeted submittal date in the fourth quarter of 2021.
- AOC 2 – South Landfarm (SWMU)
  - Routine groundwater monitoring will continue at the South Landfarm, pending approval and execution of the proposed Closure Plan. A RAW was submitted to the USEPA and NJDEP for the South Landfarm in September 2016. Comments were received from the

USEPA and NJDEP on March 20, 2019 and a response is currently being prepared and targeted for submittal in 2022.

- The updated Groundwater Sampling Plan for the South Landfarm is being prepared with a targeted submittal date in the first quarter of 2022.
- AOC 3 – No. 1 Landfarm (SWMU)
  - Routine groundwater monitoring will continue at the No. 1 Landfarm during closure activities. The updated Groundwater Sampling Plan for the No. 1 Landfarm was submitted on August 25, 2021 to the NJDEP and USEPA. We are currently waiting for review and approval from the agencies.
  - Remedial capping activities began in October 2021 for the No. 1 Landfarm. Hess/Earth Systems will also provide periodic updates regarding capping progress throughout the fourth quarter of 2021 during the Hess / agency bi-weekly calls, at a minimum.

As part of routine site inspections, the North and South Landfarm are both inspected periodically. There has periodically been some standing water observed within the confines of the landfarms. However, both landfarms are surrounded by dike walls that retain runoff from the landfarms. Specifically, the North Landfarm is bordered to the west and to the north by the earthen retention dike of Tank 7945 and on the east and south by a dike system built to retain run-off from the Landfarm and the South Landfarm is surrounded by a 4-foot earthen dike system.

**NJDEP Comment 10:** Further explanation is needed:

- A. The response addresses the revision of the AOC 13 lagoon limits (oily-water lagoon, mini-lagoon, backwash lagoon). The response does not address the complete comment related to other features from the schematic that remain on site figures, and the actual location of the piping between the API Separator and the former treatment plant(s). Figures were not included with the response, therefore, future document figures will be reviewed. Note: the CSM figures did not include the backwash lagoon; future figures should include it.

**Earth Systems/Hess Response 10A:** Draft figures depicting AOC 13 lagoon limits have been included with this response. If these figures are approved by the NJDEP, this figure will be the figure used going forward with all submittals.

- B. Historic information (aerial photos) should be used to revise location AOC 78. The location of AOC 78 appears to be approximated and will have to be finalized. Note: the CSM figures for AOC 78 do not appear to be accurate.

**Earth Systems/Hess Response 10B:** Draft figures depicting AOC 78 depicted over several historic aerial photographs have been included with this response. Once the NJDEP approves the location and depiction of AOC 78, the AOC outline will be permanently revised.

- C. Figures will be updated to include underground petroleum pipelines, the urban sewer, stormwater collection systems, discharge lines from the oily water lagoon and treatment plant(s). Note: the CSM omitted the urban sewer/Port Reading sewer that goes through the site and reportedly through the dike to the Head of Smith Creek basin.

**Earth Systems/Hess Response 10C:** Historic facility drawings will continue to be reviewed and all Remedial Investigation Report figures updated, if necessary. In the next revision of the CSM, the figures will be updated to include the urban sewer.

- D. Department comments were related to the information in Table 1a and Table 1b (2<sup>nd</sup> Quarter 2020 progress report), including the data and reference points for the columns labeled “DTB original”, “DTB from TOC”, TR-4R and TR-4D labeling, TOC elevations at SC-wells, PL-7, AD-9DD. The comments were identified as addressed in the Hess January 7, 2021, Well Manual response to comments. The Department reviewed the 1-7-21 Well Manual response. The Department review was supplemented by the April 22, 2021, email with information from the SC- wells.

The condition of PL-7 needs to be confirmed and if the well is damaged. The quarterly report gauging indicated DTB from TOC as 5.01’ TOC. November 2020 total depth gauging for PL-7 was not included in the January 2021 WCST. Earlier TD information indicated the well was deeper than expected.

**Earth Systems/Hess Response 10D:** All Well Manual comments have been addressed and the Well Manual and Well Construction Summary Table will be finalized, dated, and revised in the future, as necessary. Once finalized by the NJDEP and EPA; and upon future updates, the Well Manual and WCST will be uploaded to the portal and a link sent to both the NJDEP and EPA.

Monitoring well PL-7 has been damaged due to Site activity and needs to be abandoned and replaced. The monitoring well will be replaced during the tankfield Remedial Investigation activities that will be conducted in early 2022. Once replaced, the Well Manual and WCST will be updated with the new permit number and current specifications.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at [ablake@earthsys.net](mailto:ablake@earthsys.net). If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

A handwritten signature in blue ink that reads "Amy Blake". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Amy Blake  
Sr. Project Manager

- c. Ms. Julia Galayda, NJDEP Case Manager (via email/Sharefile)  
Mr. John Schenkewitz – Hess Corporation (via e-mail)  
Mr. Rick Ofsanko – Earth Systems (via e-mail)  
Mr. John Virgie – Earth Systems (via e-mail)





## LEGEND



Site Boundary

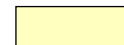


AOC Boundary

### AOC Groupings



Oily Water Lagoons



Former Oily Water Lagoon/  
Current South Landfarm Limits

**FIGURE: 1**

## Oily Water Lagoons 1963

HESS CORPORATION  
FORMER PORT READING COMPLEX  
750 CLIFF ROAD  
PORT READING, NEW JERSEY

Project #:	1114J01	Drawn:	10/15/2021
SRP PI#:	006148	Drawn By:	AE



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T. 732.739.6444 | F. 732.739.0451

This map was developed using New Jersey Department of Environmental Protection Geographic Information System Digital Data, but this secondary product has not been verified by NJDEP and is not state Authorized. Source: NAD 1983 (2011) New Jersey State Plane FIPS 2900 US FT.





**LEGEND**

- Site Boundary
- AOC Boundary
- AOC Groupings**
  - Oily Water Lagoons
  - Former Oily Water Lagoon/  
Current South Landfarm Limits

**FIGURE: 5**

**Oily Water Lagoons  
1972**

**HESS CORPORATION  
FORMER PORT READING COMPLEX  
750 CLIFF ROAD  
PORT READING, NEW JERSEY**

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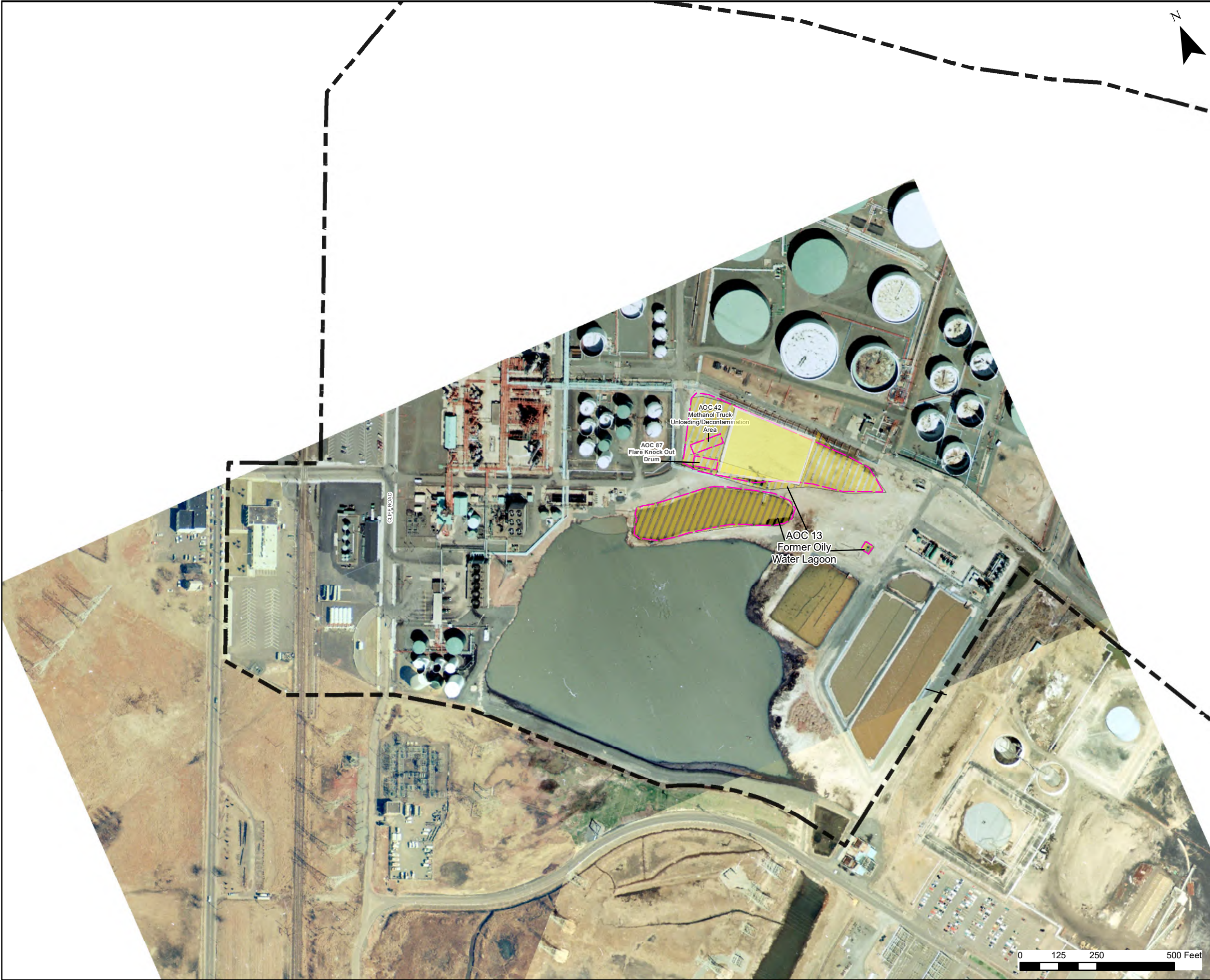


Environmental Engineering

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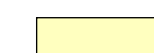




**LEGEND**

-  Site Boundary
-  AOC Boundary

**AOC Groupings**

-  Oily Water Lagoons
-  Former Oily Water Lagoon/  
Current South Landfarm Limits

**FIGURE: 6**

**Oily Water Lagoons  
1979**

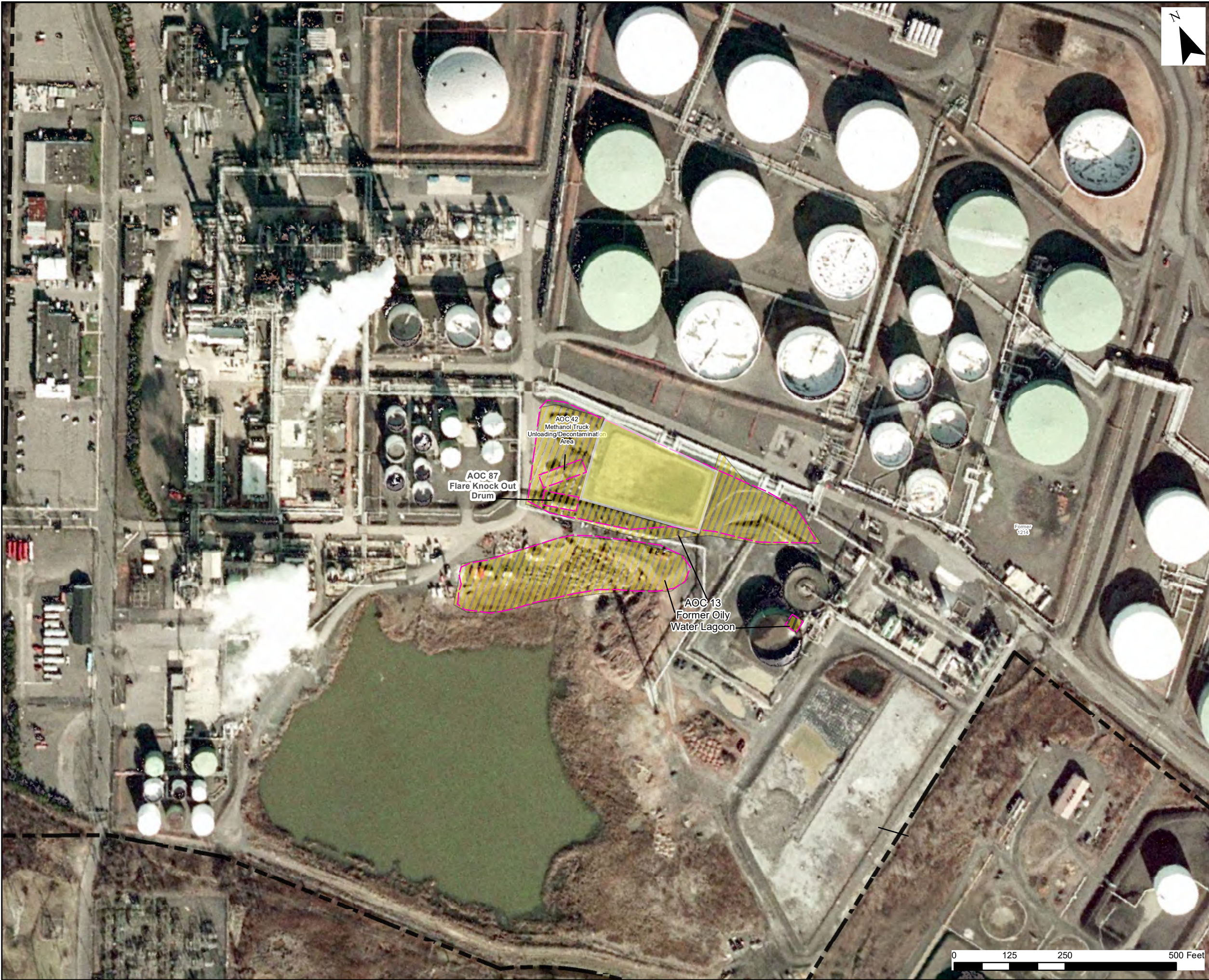
**HESS CORPORATION  
FORMER PORT READING COMPLEX  
750 CLIFF ROAD  
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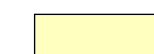




## LEGEND

-  Site Boundary
-  AOC Boundary

### AOC Groupings

-  Oily Water Lagoons
-  Former Oily Water Lagoon/  
Current South Landfarm Limits

**FIGURE: 10**  
**Oily Water Lagoons**  
**2006**

HESS CORPORATION  
FORMER PORT READING COMPLEX  
750 CLIFF ROAD  
PORT READING, NEW JERSEY

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**Earth Systems**  
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